

CITY OF LOS ANGELES

CALIFORNIA



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October 9, 2019

To: Michael J. Wilhelm
Chief, Policy and Licensing Division
Public Safety and Homeland Security Bureau
Federal Communications Commission (FCC)
445 12th St. SW
Washington, D.C. 20554

From: Aram Sahakian
General Manager
Emergency Management Department

Subject: **CITY OF LOS ANGELES EMERGENCY MANAGEMENT DEPARTMENT APPLICATION FOR FCC
RULE WAIVER**

Dear Mr. Wilhelm:

The City of Los Angeles Department of Emergency Management Department (EMD) is respectfully requesting an FCC Rule Waiver for an exemption from 47 CFR, Part 10 and 47 CFR, Part 11 rules (Waiver). We are seeking the Waiver to allow the execution of a special test of the Wireless Emergency Alert (WEA) System. The geographic area of the test will be targeted within the City of Los Angeles.

The Cities of Oakland, San Diego, and San Francisco have, or will soon, conduct similar tests to determine the feasibility of use of the Integrated Public Alert and Warning System (IPAWS) WEA alert system on a countywide basis. The City of Los Angeles requests permission to conduct a **WEA live code at 10:00 am Saturday, November 16th, 2019**. The purpose of this test is to 1) test EMD's ability to successfully execute the WEA process; and, 2) promote wildfire and evacuation preparedness for high-risk communities. Due to this test supporting a larger exercise a backup date is not requested; if a local or regional emergency arises the test will be canceled. This test is not a substitute for other required tests.

EMD requests this test with the good cause of increased intensity and persistence of wildfire conditions that threaten the City, especially in the Wildland Urban Interface (WUI). WUI areas, such as this WEA test target area, are simultaneously at the highest risk of wildfire and the most difficult to deliver emergency messages and evacuate.

High fire danger weather "Red Flag" warnings from the National Weather Service (NWS) and LAFD Fire Meteorologists are becoming more frequent and of longer duration. The NWS has already forecasted a Red Flag conditions for October 10th and 11th. Red Flag conditions also drive electric utilities to preemptively turn off power in high-risk areas during high-risk weather conditions, a policy known as a Public Safety Power Shutoff, further complicating the alert and warning efforts forcing EMD to be more reliant on WEA.

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The proposed text of the test will read similar to:

TEST: City of LA emergency alert system test. Info and survey at <https://arcg.is/1OTXWv>

As part of this test, EMD will implement an outreach program to include but not limited to:

1. The LAFD will engage the public in the target areas through Neighborhood Councils and City Council Members.
2. LAFD will conduct two town hall meetings educating the public on emergency preparedness, to include IPAWS and WEA, as well as specifics of the exercise.
3. EMD will support an LAFD lead social media campaign informing the public of the town halls, the exercise and educating the public about IPAWS/WEA.
4. EMD will inform the City's 911 and 311 services of the exercise details.
5. EMD will inform the Los Angeles County Operational Area, adjacent cities and supporting jurisdictions (California Highway Patrol, CalTrans, etc.) of the exercise details.
6. The WEA message will be concurrent with EMD's 'opt-in' system alert and warning system, NotifyLA, to subscribers in the targeted geographic area.

EMD will provide the FCC with a copy of our after-action review including any problems and post-test analysis. The point of contact for this memorandum is Chris Carey, Emergency Management Coordinator I, who can be reached at chris.carey@lacity.org or (213) 484-4800.



Aram Sahakian
General Manager
Emergency Management Department